EXHIBIT D
CHEVRON DECLARATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STATE OF CALIFORNIA, et al., Plaintiffs, v. UNITED STATES OF AMERICA; U.S. ENVIRONMENTAL PROTECTION AGENCY; LEE ZELDIN, in his official capacity as Administrator of the U.S. Environmental protection Agency; and DONALD J. TRUMP, Defendants.	Case No. 4:25-cv-04966 **DECLARATION OF JOHN MARTINI IN SUPPORT OF PROPOSED INTERVENORS' MOTION TO INTERVENE**

I, John Martini, declare as follows:

1. I am the General Manager of Enterprise Policy for Chevron Corporation ("Chevron"), which is an energy company with subsidiaries and affiliates engaged in integrated energy operations, including oil and gas exploration, production, refining, distribution, and marketing, as well as manufacturing and marketing of refined petroleum products and renewable fuels. Chevron's subsidiary Chevron U.S.A Inc. is a major refiner of petroleum products in the United States. Chevron's subsidiary Renewable Energy Group, Inc. ("CREG") produces renewable transportation fuels and develops innovative renewable fuel technologies. Chevron's subsidiaries also market petroleum products and biofuels in the U.S. including liquid transportation fuels.

2. Chevron is a member of the American Petroleum Institute ("API") and Chevron U.S.A. Inc. is a member of the American Fuel & Petrochemical Manufacturers ("AFPM").

3. As part of my work for Chevron, I am familiar with Chevron's analyses of the impacts of various policies and market scenarios on Chevron's subsidiaries, including regulatory changes in the transportation fuels market.

4. I am over 18 years old. This Declaration is based upon my personal knowledge and/or upon my review of business records of Chevron.

5. As stated in Chevron's 2024 Annual Report, Chevron believes that the future of energy is lower carbon. Chevron continues to take actions that attempt to help lower the carbon intensity of its operations while meeting the world's demand for energy. Chevron also supports well-designed climate policy. Chevron believes that policies seeking to reduce GHG emissions from products and services should do so on a lifecycle GHG intensity basis as this approach allows suppliers to differentiate themselves based on their carbon performance. In the transportation sector, specifically, Chevron supports technology neutral policies that cost-effectively drive GHG emission reductions, rather than policies that artificially pick winners and losers among various technology options to the detriment of consumers and effective climate policy.

6. Relevant to Chevron's business, Congress recently exercised its authority under the Congressional Review Act ("CRA") to disapprove the Environmental Protection Agency's ("EPA") decisions to grant several waivers to California between 2023 and 2025. These waivers authorized California to enforce its Advanced Clean Cars II, Advanced Clean Trucks, and Omnibus Low NOx regulations. *See* 88 Fed. Reg. 20,688 (Apr. 6, 2023); 90 Fed. Reg. 642 (Jan. 6, 2025); 90 Fed. Reg. 643 (Jan. 6, 2025).

7. On June 12, 2025, the President signed joint resolutions of disapproval passed by both the House and the Senate disapproving of the waiver decisions. These resolutions lawfully nullified EPA's waiver grants to California, preventing the enforcement of California's Advanced Clean Cars II, Advanced Clean Trucks, and Omnibus Low NOx regulations.

8. California's Advanced Clean Cars II, Advanced Clean Trucks, and Omnibus Low NOx regulations—had they not been nullified by Congress—would have empowered California and states that follow its lead to enforce rules that suppress the manufacture and sale of internal combustion engine vehicles, including through increasingly stringent NOx requirements and mandates for zero-emission vehicle sales.

9. California's regulations would have significantly decreased the demand for fuel sales, as the State recognizes,[1] and would have caused automakers to produce and sell more vehicles (than they otherwise would) that use no liquid fuel at all.

10. California's lawsuit seeks to resurrect those regulations. Chevron's interests would be harmed if that effort succeeded. By reducing demand for liquid transportation fuels, California's regulations would have a direct financial impact on Chevron by artificially skewing the market and reducing the sales that Chevron's subsidiaries would otherwise have made.

11. For example, Chevron's subsidiary Chevron U.S.A. Inc. operates five wholly owned refineries in the United States and has a total crude refining capacity in the U.S. of over one million barrels per day.[2] California's regulations would have directly impacted these operations by significantly reducing demand for this subsidiary's products.

12. CREG also produces and sells liquid transportation fuels, including bio-based renewable diesel and biodiesel, and operates multiple active biorefineries in the United States. CREG is one of the largest producers of biomass-based diesel by volume in the United States, as well as a producer and supplier of many other products. Bio-based renewable diesel and biodiesel can generally be used in a wide range of diesel engines and their use results in lower carbon intensity emissions on a lifecycle basis compared to petroleum diesel. California's regulations would reduce demand for these fuels as well.

13. California's regulations would also harm Chevron's subsidiaries' efforts to develop creative and effective ways to meet the world's energy needs. By forcing the shift towards electric

[1] *See* California Air Resources Board, *Response to Comments on the Draft Environmental Analysis Prepared for the Advanced Clean Cars II Program* (Aug. 24, 2022) at 55 n.54, https://perma.cc/BJS4-RSRV (estimating the reduction of fuel sales by 15% by 2040); *see also* Ellen Robo, et al., *California Clean Trucks Program,* Env't Rsch. Mgmt. Grp. (2022) at 11, https://perma.cc/7BNU-XRKS (study of the Advance Clean Trucks program, estimating fuel sales to drop by over 40% by 2036).

[2] Chevron, Delivering Higher Returns: 2023 Supplement to the Annual Report 21, https://www.chevron.com/-/media/shared-media/documents/2023-chevron-annual-report-supplement.pdf (noting United States-Consolidated refinery capacities of 1,059,000 barrels per day at year-end 2023).

vehicles, despite public reports of slowing consumer demand,[3] California's regulations would have disincentivized other lower-carbon technologies that could help customers reduce GHG emission intensity. These include renewable natural gas made from dairy methane and the development of other novel catalysts to create renewable fuels, which could be used to lower the lifecycle carbon emissions of heavy-duty vehicles with internal combustion engines. California's proposed policies suppress these innovations by mandating a single technological outcome and thereby eliminating incentives to pursue alternative lower-carbon fuels.

14. If the disapproved waivers were reinstated, Chevron and its subsidiaries would face renewed harm. They would be subject to a fragmented, state-level regulatory scheme that disrupts the national market for transportation fuels. That disruption would impede Chevron's ability to plan and invest efficiently. It would threaten Chevron's business interests and would burden its customers. A decision maintaining the validity of the CRA disapprovals would prevent that harm. It would preserve a uniform and predictable regulatory framework.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 6th day of August, 2025, in Santa Clara.

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JOHN MARTINI

[3] Jennifer Ramsay. *Behind the EV Slowdown*, IndustryWeek (Jul. 1, 2025), https://perma.cc/FEC6-UHEB.